

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

JAMES OXENDINE
DBA SOUTHEAST BULLY
KENNELS
Plaintiff
v.

BLOCKLINE BULLIES, LLC and
STEVEN COKER
Defendants

JUDGE JAMES D. CAIN, JR.

CASE: 2:24-cv-00740

MAGISTRATE JUDGE LEBLANC

DECLARATION OF JAMES OXENDINE IN OPPOSITION OF DEFENDANTS'

MOTION FOR SUMMARY JUDGMENT

I, James Oxendine, declare under penalty of perjury that the following facts are true and correct:

1. Southeast Bully Kennels is a sole proprietorship formed on or about the year 2012.
2. I am the owner of the registered trademark "Block Bloodline"; and this mark is registered on the principal register under registration number 7155100.
3. I have been around dogs my entire life, and in the dog industry throughout the course of twenty years since 2004.
4. I am a seasoned dog trainer.
5. It takes time, expertise, and patience to craft a "one of a kind" bloodline and lineage.
6. In 2007, I meticulously began the process of creating and perfecting my own bloodline.
7. In 2012, I began conducting animal breeding services under the mark "Block Bloodline".
8. In 2013, I began selling bully dogs under the trademark "Block Bloodline".

9. My bully dogs are registered with the *American Bully Kennel Club*, *United Kennel Club*, and *US Bully Registry Office*.
10. Prior to applying for my trademark and applying for my registration, I was not aware of any other bully dog breeding service, with a registered trademark, that contained the word “block” in a composite term with bloodline.
11. At the time of filing this initial complaint, there were no pending or registered trademarks that contained the word “block” for animal breeding services for bully dogs.
12. I was unaware of Steven Coker and Blockline Bullies L.L.C., until I received a trademark monitoring report from *Trademark Engine*®, which alerted me to a bully dog breeding business that contained a name that could likely cause confusion with my registered mark “Block Bloodline”. (Pl.[‘s] Reply Br. Ex. 2, at 2-5, November 14, 2023, ECF. No. 15-4.). *Trademark Engine*® is a paid service that Mr. Oxendine pays for.
13. I have sold bully dogs, under the mark “Block Bloodline”, since as early as 2013.
14. I have sold bully dogs, under the mark “Block Bloodline”, throughout the entire United States (including the Gulf South region), and not just in North and South Carolina. (See Pl.[‘s] Decl. Exs. 1-2).
15. I have been the owner of the Instagram® page @blockbloodline since 2014.
16. I attempted to mitigate with Steven Coker and Blockline Bullies LLC, by sending two cease and desist letters, but I received no response. (Pl.[‘s] Ex. E, at 1-2, February 15, 2024, ECF. No. 1-5.) and (Pl.[‘s] Ex. D, at 1-6, March 20, 2024, ECF. No. 1-4).

This declaration was signed and executed by James Oxendine, on August 14, 2024, at Lancaster, South Carolina.


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James Oxendine

eSignature Details

Signer ID:	w44ZALcbKxeNepUUcDF9jXqc
Signed by:	James Oxendine
Sent to email:	southeastbullykennels@gmail.com
IP Address:	208.104.59.127
Signed at:	Aug 14 2024, 10:31 am CDT